

**QUINN EMANUEL URQUHART & SULLIVAN, LLP**  
Stephen A. Swedlow (*pro hac vice*)  
stephenswedlow@quinnemanuel.com  
191 N. Wacker Drive, Suite 2700  
Chicago, IL 60606  
(312) 705-7400

**HAGENS BERMAN SOBOL SHAPIRO LLP**  
Shana E. Scarlett (Bar No. 217895)  
shanas@hbsslaw.com  
715 Hearst Avenue, Suite 202  
Berkeley, CA 94710  
(510) 725-3000

*Interim Co-Lead Consumer Class Counsel*

**BATHAE DUNNE LLP**  
Yavar Bathaee (Bar No. 282388)  
yavar@bathaeedunne.com  
445 Park Avenue, 9th Floor  
New York, NY 10022  
(332) 205-7668

**SCOTT+SCOTT ATTORNEYS AT LAW LLP**  
Kristen M. Anderson (Bar No. 246108)  
kanderson@scott-scott.com  
230 Park Avenue, 17th Floor  
New York, NY 10169  
(212) 233-6444

*Interim Co-Lead Advertiser Class Counsel*

**WILMER CUTLER PICKERING  
HALE AND DORR LLP**  
SONAL N. MEHTA (SBN 222086)  
Sonal.Mehta@wilmerhale.com  
2600 El Camino Real, Suite 400  
Palo Alto, California 94306  
Telephone: (650) 858-6000

DAVID Z. GRINGER (*pro hac vice*)  
David.Gringer@wilmerhale.com  
7 World Trade Center  
250 Greenwich Street  
New York, New York 10007  
Telephone: (212) 230-8800

ARI HOLTZBLATT (*pro hac vice*)  
Ari.Holtzblatt@wilmerhale.com  
MOLLY M. JENNINGS (*pro hac vice*)  
Molly.Jennings@wilmerhale.com  
1875 Pennsylvania Ave NW  
Washington, DC 20006  
Telephone: (202) 663-6000

*Attorneys for Defendant Meta Platforms, Inc.*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, et al., on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware  
Corporation headquartered in California,

Defendant.

Case No. 3:20-cv-08570-JD

**JOINT STIPULATION TO EXTEND  
TIME FOR DEFENDANT META  
PLATFORMS, INC.'S RESPONSIVE  
PLEADINGS PURSUANT TO LOCAL  
RULE 6-1(a)**

Judge: Hon. James Donato

**JOINT STIPULATION**

WHEREAS, plaintiffs Jessyca Frederick, Mark Young, Joshua Jeon, 406 Property Services, PLLC, Mark Berney, and Katherine Looper (collectively, “Advertiser Plaintiffs”) served their Consolidated Advertiser Class Action Complaint on April 22, 2021 (ECF No. 86);

WHEREAS, plaintiffs Maximilian Klein, Sarah Grabert, and Rachel Banks Kupcho (collectively, “Consumer Plaintiffs”) served their Consolidated Consumer Class Action Complaint on April 22, 2021 (ECF No. 87);

WHEREAS, defendant Meta Platforms, Inc. filed a Motion to Dismiss the Consolidated Consumer and Advertiser Class Action Complaints on May 20, 2021 (ECF No. 97), and the Court granted that motion in part with leave to amend on January 14, 2022 (ECF No. 214);

WHEREAS, Consumer Plaintiffs have elected not to amend the Consolidated Consumer Class Action Complaint (*see* ECF No. 227 at 5);

WHEREAS, Meta and plaintiffs have previously agreed that Meta may answer the Consolidated Consumer Class Action Complaint on March 10, 2022 (*see* ECF No. 227 at 9);

WHEREAS, pursuant to the Court’s order, Advertiser Plaintiffs filed a First Amended Consolidated Advertiser Class Action Complaint (“First Amended Complaint”) on February 28, 2022 (ECF No. 237);

WHEREAS, pursuant to Federal Rule of Civil Procedure 15(a)(3), Meta’s deadline to respond to Advertiser Plaintiffs’ First Amended Complaint is on or before March 14, 2022;

WHEREAS, Meta and plaintiffs have previously agreed to allow an additional seven (7) days for Meta to respond to Advertiser Plaintiffs’ First Amended Complaint, which is well over 800 paragraphs, through March 21, 2022 (*see* ECF No. 227 at 9);

WHEREAS, Local Rule 6-1(a) provides that the “Parties may stipulate in writing, without a Court order, to extend the time within which to answer or otherwise respond to the complaint, or to enlarge or shorten the time in matters not required to be filed or lodged with the Court, provided the change will not alter the date of any event or any deadline already fixed by Court order”;

1 WHEREAS, this extension of time will not alter the date of any event or any deadline  
2 already fixed by Court Order (*see* ECF No. 222);

3 WHEREAS, this extension is not sought for the purpose of undue delay and no party will  
4 be prejudiced by the brief extension of time;

5 ACCORDINGLY, pursuant to Civil Local Rules 5 and 6-1(a), Meta and plaintiffs, by and  
6 through their respective counsel, hereby stipulate without court order that: (1) Meta's deadline to  
7 answer the Consumer Plaintiffs' Consolidated Class Action Complaint shall be March 10, 2022;  
8 and (2) Meta's deadline to answer, move, or otherwise respond to the Advertiser Plaintiffs' First  
9 Amended Complaint shall be extended by seven (7) days from March 14, 2022, up to and  
10 including March 21, 2022.

11 DATED: March 4, 2022

Respectfully submitted,

12 By: /s/ Yavar Bathaee  
13 **BATHAEE DUNNE LLP**  
14 Yavar Bathaee (Bar No. 282388)  
15 yavar@bathaeedunne.com  
16 Edward M. Grauman (admitted *pro hac vice*)  
17 egrauman@bathaeedunne.com  
18 Andrew C. Wolinsky (admitted *pro hac vice*)  
19 awolinsky@bathaeedunne.com  
20 445 Park Avenue, 9th Floor  
21 New York, NY 10022  
22 (332) 322-8835

23 Brian J. Dunne (Bar No. 275689)  
24 bdunne@bathaeedunne.com  
25 633 West Fifth Street, 26th Floor  
26 Los Angeles, CA 90071  
27 (213) 462-2772

28 By: /s/ Kristen M. Anderson  
**SCOTT+SCOTT ATTORNEYS AT LAW LLP**  
Kristen M. Anderson (Bar No. 246108)  
kanderson@scott-scott.com  
230 Park Avenue, 17th Floor  
New York, NY 10169  
(212) 223-6444

By: /s/ Stephen A. Swedlow  
**QUINN EMANUEL URQUHART & SULLIVAN, LLP**  
Stephen A. Swedlow (admitted *pro hac vice*)  
stephenswedlow@quinnemanuel.com  
Michelle Schmit (admitted *pro hac vice*)  
michelleschmit@quinnemanuel.com  
191 N. Wacker Drive, Suite 2700  
Chicago, IL 60606-1881  
(312) 705-7400

Kevin Y. Teruya (Bar No. 235916)  
kevinteruya@quinnemanuel.com  
Adam B. Wolfson (Bar No. 262125)  
adamwolfson@quinnemanuel.com  
Brantley I. Pepperman (Bar No. 322057)  
brantleypepperman@quinnemanuel.com  
865 South Figueroa Street, 10th Floor  
Los Angeles, CA 90017-2543  
(213) 443-3000

Manisha M. Sheth (admitted *pro hac vice*)  
manishasheth@quinnemanuel.com  
51 Madison Avenue, 22nd Floor  
New York, New York 10010  
(212) 849-7000

Christopher M. Burke (Bar No. 214799)  
 cburke@scott-scott.com  
 David H. Goldberger (Bar No. 225869)  
 dgoldberger@scott-scott.com  
 Yifan (Kate) Lv (Bar No. 302704)  
 klv@scott-scott.com  
 Hal D. Cunningham (Bar No. 243048)  
 hcunningham@scott-scott.com  
 Daniel J. Brockwell (Bar No. 335983)  
 dbrockwell@scott-scott.com  
 600 W. Broadway, Suite 3300  
 San Diego, CA 92101  
 (619) 233-4565

Patrick J. McGahan (admitted *pro hac vice*)  
 pmcgahan@scott-scott.com  
 Michael P. Srodoski (admitted *pro hac vice*)  
 msrodoski@scott-scott.com  
 156 South Main Street, P.O. Box 192  
 Colchester, CT 06415  
 (860) 537-5537

**AHDOOT & WOLFSON, PC**  
 Tina Wolfson (Bar No. 174806)  
 twolfson@ahdootwolfson.com  
 Robert Ahdoot (Bar No. 172098)  
 rahdoot@ahdootwolfson.com  
 Theodore W. Maya (Bar No. 223242)  
 tmaya@ahdootwolfson.com  
 Rachel Johnson (Bar No. 331351)  
 rjohnson@ahdootwolfson.com  
 2600 West Olive Avenue, Suite 500  
 Burbank, CA 91505  
 (310) 474-9111

**LEVIN SEDRAN & BERMAN LLP**  
 Keith J. Verrier (admitted *pro hac vice*)  
 kverrier@lfsblaw.com  
 Austin B. Cohen (admitted *pro hac vice*)  
 acohen@lfsblaw.com  
 510 Walnut Street, Suite 500  
 Philadelphia, PA 19106-3997  
 (215) 592-1500

*Interim Counsel for the Advertiser Class*

By: /s/ Shana E. Scarlett  
**HAGENS BERMAN SOBOL SHAPIRO LLP**  
 Shana E. Scarlett (Bar No. 217895)  
 shanas@hbsslaw.com  
 715 Hearst Avenue, Suite 202  
 Berkeley, CA 94710  
 (510) 725-3000

Steve W. Berman (admitted *pro hac vice*)  
 steve@hbsslaw.com  
 1301 Second Avenue, Suite 2000  
 Seattle, WA 98101  
 (206) 623-7292

**LOCKRIDGE GRINDAL NAUEN P.L.L.P.**  
 W. Joseph Bruckner (admitted *pro hac vice*)  
 wjbruckner@locklaw.com  
 Robert K. Shelquist (admitted *pro hac vice*)  
 rkshelquist@locklaw.com  
 Brian D. Clark (admitted *pro hac vice*)  
 bdclark@locklaw.com  
 Rebecca A. Peterson (Bar No. 241858)  
 rapeterson@locklaw.com  
 Arielle S. Wagner (admitted *pro hac vice*)  
 aswagner@locklaw.com  
 Kyle J. Pozan (admitted *pro hac vice*)  
 kjpozan@locklaw.com  
 Laura M. Matson (admitted *pro hac vice*)  
 lmmatson@locklaw.com  
 100 Washington Avenue South, Suite 2200  
 Minneapolis, MN 55401  
 (612) 339-6900

*Interim Counsel for the Consumer Class*

By: /s/ Sonal N. Mehta  
**WILMER CUTLER PICKERING HALE  
 AND DORR LLP**  
 Sonal N. Mehta (Bar No. 222086)  
 2600 El Camino Real, Suite 400  
 Palo Alto, California 94306  
 Telephone: (650) 858-6000  
 Email: Sonal.Mehta@wilmerhale.com

David Z. Gringer (admitted *pro hac vice*)  
 7 World Trade Center  
 250 Greenwich Street  
 New York, New York 10007  
 Telephone: (212) 230-8800  
 Email: David.Gringer@wilmerhale.com

Ari Holtzblatt (admitted *pro hac vice*)  
Molly M. Jennings (admitted *pro hac vice*)  
1875 Pennsylvania Avenue NW  
Washington, DC 20006  
Telephone: (202) 663-6000  
Email: Ari.Holtzblatt@wilmerhale.com  
Email: Molly.Jennings@wilmerhale.com

*Attorneys for Defendant Meta Platforms, Inc.*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**SIGNATURE ATTESTATION**

I am the ECF User whose identification and password are being used to file the foregoing. Pursuant to Civil Local Rule 5-1(h)(3), I hereby attest that the other signatories have concurred in this filing.

Dated: March 4, 2022

By: /s/ Sonal N. Mehta  
Sonal N. Mehta

**CERTIFICATE OF SERVICE**

I hereby certify that on this 4th day of March 2022, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF System.

By: /s/ Sonal N. Mehta  
Sonal N. Mehta